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 LEDROIT & CIE

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION

BERCUT-VANDERVOORT & CO., a
 California corporation,

Plaintiff,

v.

MAISON TARRIDE LEDROIT & CIE, a
 French company,

Defendant.

) Case No.: C-05-5122 JF
)
) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE MOTION TO**
) **DISMISS HEARING AND CASE**
) **MANAGEMENT CONFERENCE**
)
) Date of initial hearings: May 5, 2006
) Time: 9:00 a.m.
) Judge: The Honorable Jeremy Fogel
) Courtroom: 3
)
)
)

Pursuant to Civil L.R., Rule 16-2(e), Plaintiff BERCUT-VANDERVOORT & CO. ("Plaintiff") and Defendant MAISON TARRIDE LEDROIT & CIE ("Defendant") by and through their respective counsel, hereby stipulate, effective upon order of the Court, as follows:

The Case Management Conference was initially scheduled for April 14, 2006 at 10:30 a.m. in the above-referenced courtroom.

Defendant's Motion to Dismiss is currently scheduled for May 5, 2006 at 9:00 a.m.

Because the Court was not available on April 14, 2006, on March 10, 2006, the parties agreed, by stipulation and order to continue the Case Management Conference to May 5, 2006, the same date as Defendant's Motion to Dismiss.

A personal obligation for Plaintiff's lead counsel, Kenneth Keller, however, has since arisen which conflicts with the May 5, 2006 hearing date.

The parties therefore agree and stipulate, upon order of the Court, to continue both the Defendants' Motion to Dismiss and the Case Management Conference from May 5, 2006 to May 26, 2006, at 9:00 a.m., the first available hearing date.

Dated: April 26, 2006

KRIEG, KELLER, SLOAN, REILEY & ROMAN LLP

By: _____/S/_____
ANNE E. KEARNS
Attorneys for Plaintiff BERCUT-VANDERVOORT & CO.

Dated: April 26, 2006

PERKINS COIE LLP

By: _____/S/_____
K.C. ALLAN
Attorneys for Defendant MAISON TARRIDE LEDROIT & CIE

PURSUANT TO STIPULATION, IT IS SO ORDERED

Date: 5/1/06



THE HONORABLE JEREMY FOGEL
UNITED STATES DISTRICT JUDGE